

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

Form OBD-68  
(Rev 10-14-76)  
Formerly DJ-307  
for

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents  
Registration Act of 1938, as amended.

NO. R226  
Approval Expires Oct. 31, 1981

RECEIVED  
DEPARTMENT OF JUSTICE  
JUL 25 3 35 PM '78  
REGISTRATION OF  
INTERNATIONAL SECURITIES  
SECTION  
CRIMINAL DIVISION

1. Name of Registrant  <b>Arnold &amp; Porter</b>	2. Registration No.  <b>1750</b>
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To correct a deficiency in
- ☐ Initial Statement
- ☐ Supplemental Statement for \_\_\_\_\_
- ☐ To give notice of change in an exhibit previously filed.
- ☒ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- ☐ Other purpose (specify) \_\_\_\_\_

4. If this amendment requires the filing of a document or documents, please list -

**Exhibits A and Exhibits B**

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

This amendment to Registrant's registration statement is to give notice of two new foreign principals of the Registrant, International Commodities Clearing House Ltd. and The London Commodity Exchange Company Ltd., and to file the necessary Exhibits A and B.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

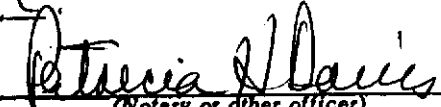
(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

  
Robert E. Herzstein

Subscribed and sworn to before me at Washington, D.C.

this 24th day of July, 19 78

My commission expires Oct. 31, 1979

  
(Notary or other officer)

DOJ

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

Furnish this exhibit for EACH foreign principal listed in an initial statement,  
and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Arnold & Porter 1229 - 19th Street, N.W. Washington, D.C. 20036	2. Registration No. 1750
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3. Name of foreign principal International Commodities Clearing House Ltd.	4. Principal address of foreign principal Roman Wall House 1-2 Crutched Friars London EC3N 2AN, England
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5. Indicate whether your foreign principal is one of the following type:

- ☐ Foreign government
- ☐ Foreign political party
- ☒ Foreign or ☐ domestic organization: If either, check one of the following:
- |   |  |
|---|--|
| <input type="checkbox"/> Partnership            | <input type="checkbox"/> Committee             |
| <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group       |
| <input type="checkbox"/> Association            | <input type="checkbox"/> Other (specify) _____ |
- ☐ Individual - State his nationality \_\_\_\_\_

6. If the foreign principal is a foreign government, state:

N.A.

a) Branch or agency represented by the registrant.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

N.A.

a) Principal address

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The foreign principal registers, clears and guarantees the fulfillment of contracts on terminal markets.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal . . . . Yes ☒ No ☐

Directed by a foreign government, foreign political party, or other foreign principal . . . Yes ☒ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal . . Yes ☒ No ☐

Financed by a foreign government, foreign political party, or other foreign principal . . . Yes ☒ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☒ No ☐


Subsidized in part by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☒ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

We believe, without knowledge, that the foreign principal is owned, controlled and financed by foreign persons and institutions.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N.A.

Date of Exhibit A	Name and Title	Signature
7/24/78	Robert E. Herzstein, Partner	

UNITED STATES DEPARTMENT OF JUSTICE  
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT  
Under the Foreign Agents Registration Act  
of 1938, as amended

RECEIVED  
DEPARTMENT OF JUSTICE  
OCT 25 3 35 PM  
REGISTRATION OF FOREIGN AGENTS  
INTERNAL SECURITY SECTION  
CRIMINAL DIVISION

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Arnold & Porter	International Commodities Clearing House Ltd.

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

(See answer to number 4, below)

- Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will advise the foreign principal with respect to U.S. laws, regulations and policies dealing with the distribution of commodity options in the United States. The fee for such representation is to be determined periodically based on usual hourly charges and other criteria for legal fees plus out-of-pocket expenses. The duration of the agreement is indefinite.

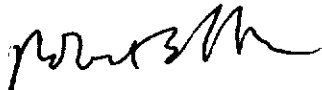
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will advise the foreign principal with respect to U.S. laws, regulations and policies dealing with the distribution of commodity options in the United States. The Registrant will engage in political and other activities as required on behalf of the foreign principal, some of which may require registration under the Act.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1/</sup> Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant will engage in political activity on behalf of the foreign principal. Such activity may include the representation of the foreign principal before Congressional committees and with various members of Congress, Congressional staff and Executive Branch officials. The purpose of such representation would be to discuss the nature of U.S. regulation of commodity options and the need for changes in such regulation.

Date of Exhibit B	Name and Title	Signature
7/24/78	Robert E. Herzstein Partner	

<sup>1/</sup> Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

EXHIBIT A  
TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

Furnish this exhibit for EACH foreign principal listed in an initial statement  
and for EACH additional foreign principal acquired subsequently.

RECEIVED  
JAN 31 1977  
U.S. DEPT. OF JUSTICE  
REGISTRATION SECTION  
35

1. Name and address of registrant Arnold & Porter 1229 - 19th Street Washington, D.C. 20036	2. Registration No. 1750
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3. Name of foreign principal The London Commodity Exchange Company Ltd.	4. Principal address of foreign principal Cereal House, 58 Mark Lane London EC3R 7NE, England
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5. Indicate whether your foreign principal is one of the following type:

- ☐ Foreign government
- ☐ Foreign political party
- ☒ Foreign or ☐ domestic organization: If either, check one of the following:
- |   |  |
|---|--|
| <input type="checkbox"/> Partnership            | <input type="checkbox"/> Committee             |
| <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group       |
| <input type="checkbox"/> Association            | <input type="checkbox"/> Other (specify) _____ |
- ☐ Individual - State his nationality \_\_\_\_\_

6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant. N.A.
- b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

- a) Principal address N.A.
- b) Name and title of official with whom the registrant deals.
- c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

- a) State the nature of the business or activity of this foreign principal

The foreign principal is an organization of London terminal markets which presents the views of the markets to governmental authorities.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal . . . . Yes ☒ No ☐

Directed by a foreign government, foreign political party, or other foreign principal. . . . Yes ☒ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal . . . . Yes ☒ No ☐

Financed by a foreign government, foreign political party, or other foreign principal . . . . Yes ☒ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☒ No ☐

Subsidized in part by a foreign government, foreign political party, or other foreign principal . . . . . Yes ☒ No ☐


9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

To the best of our information, the following foreign institutions own and control the foreign principal:

The Coffee Terminal Market Association of London  
The London Cocoa Terminal Market Association  
The London Rubber Terminal Market Association  
The London Vegetable Oil Terminal Market Association  
The London Wool Terminal Market Association  
The Soyabean Meal Futures Association  
The United Terminal Sugar Market Association  
The International Commodities Clearing House Ltd.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N.A.

Date of Exhibit A	Name and Title	Signature
7/24/78	Robert E. Herzstein Partner	

UNITED STATES DEPARTMENT OF JUSTICE  
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT  
Under the Foreign Agents Registration Act  
of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit-B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Arnold & Porter	The London Commodity Exchange Company Ltd.

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

(See answer to number 4, below)

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will advise the foreign principal with respect to U.S. laws, regulations and policies dealing with the distribution of commodity options in the United States. The fee for such representation is to be determined periodically based on usual hourly charges and other criteria for legal fees plus out-of-pocket expenses. The duration of the agreement is indefinite.




5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will advise the foreign principal with respect to U.S. laws, regulations and policies dealing with the distribution of commodity options in the United States. The Registrant will engage in political and other activities as required on behalf of the foreign principal, some of which may require registration under the Act.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1/</sup> Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant will engage in political activity on behalf of the foreign principal. Such activity may include the representation of the foreign principal before Congressional committees and with various members of Congress, Congressional staff and Executive Branch officials. The purpose of such representation would be to discuss the nature of U.S. regulation of commodity options and the need for changes in such regulation.

Date of Exhibit B	Name and Title	Signature
7/24/78	Robert E. Herzstein Partner	

<sup>1/</sup> Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.